



Muriel Goode-Trufant  
Acting Corporation Counsel

THE CITY OF NEW YORK  
**LAW DEPARTMENT**  
100 CHURCH STREET  
NEW YORK, NY 10007

Lauren Howland  
Special Assistant Corporation Counsel  
Office: (212) 356-2016

November 15, 2024

**VIA ECF**

Hon. Denise L. Cote  
Daniel Patrick Moynihan United States Courthouse  
500 Pearl Street  
New York, New York 10007

*Denise L. Cote*  
*Denise L. Cote*  
*11/15/24*

Re: *J.L. v. NYC Dep't of Education*, 17-CV-7150 (DLC)(KHP)

Dear Judge Cote:

I am the Special Assistant Corporation Counsel in the Office of the Corporation Counsel of the City of New York assigned to represent Defendant New York City Department of Education ("DOE") in the above-referenced matter, in which Plaintiffs, parents on behalf of two students, allege that their rights were violated due to alleged systemic delays in providing coordinated nursing and transportation services.

I write respectfully and on behalf of the parties pursuant to the Court's November 13, 2024 Order (ECF No. 352) to jointly request that the Court adjourn the briefing schedule for Plaintiffs' motion for attorneys' fees and costs until December 20. This is the second request for an extension, the first request was granted in part yesterday, with Plaintiffs' motion due November 22.

While the parties are hopeful that Plaintiffs' claim for fees and costs can be resolved without burdening the Court with motion practice, that discussion would be premature at this juncture. The parties are still working to resolve the remaining substantive claims at issue here, and are hopeful that those issues will be resolved at the settlement conference currently scheduled before Magistrate Judge Parker on November 20, 2024.

Plaintiffs' counsel provided Defendants with complete relevant attorney records on August 22, less than 90 days ago—the average time required by Defendants' to conduct the City's internal review process on simple IDEA fees applications. The increased complexity of the instant matter warrants additional review and discussion between the parties. Further, Plaintiffs will likely incur additional fees for preparing for and attending the upcoming settlement conference. The requested extension will allow for the parties to account for and discuss that updated demand following the conference.

Accordingly, the parties respectfully request that the Court adjourn the current briefing schedule until December 20 to allow time to determine whether the substantive claims have been resolved, and whether full resolution of the claims in this matter obviate the need for a briefing

schedule.

Thank you for considering this request.

Respectfully submitted,  
/s/

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Lauren Howland, Esq.  
Special Assistant Corporation Counsel

cc: All Counsel of record (via ECF)